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The art rejections are respectfully traversed.

As a general note, because the references are complex[1], Applicants have only considered those portions actually referred to by the Examiner; and any other portions noted herein. Applicants do not make any representations with respect to other sections of the references, not noted in the office action or herein.

It appears that the two references are in different fields. Based on the titles and abstracts, One of ordinary skill in the art would conclude that Lemmons relates to a program guide system for an individual user; while Herz relates to a system for a broadcaster to determine what to show based on ratings. One of ordinary skill in the art would not look to a system for use by broadcasters, such as is shown in Herz, to supplement a system which is for use by individual users, such as is shown by Lemmons.

For the rest of the argument, the distinction between a rating and profile needs to be recalled. A rating is related to a particular program. A profile is related to a user or group of users. A rating may be based on a profile, or it may be based on user behavior. A profile may be based on a user selections (explicit) or user behavior (implicit). In general, Lemmons shows changing a profile before a rating is established. In general, Herz shows both changing a profile before a rating is established and changing a rating, but not changing a profile once a rating is established. Therefore both are similarly defective.

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[1] Lemmons has 13 sheets of drawing and 18 columns of text. Hertz has 11 sheets of drawing and 56 columns of text.

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Art rejections: independent claims 1 & 19

Claim 1 recites a <u>user interface</u> for a recommender system. The user interface comprises a <u>display screen</u> having first and second regions. The first region displays a **_RATING_** derived from a previously defined preference <u>profile</u> contained in the recommender system. The **second region** displays preference settings in the profile that were used to define the rating. It should be noted that this claim requires:

- A display screen

- A first region on the display screen, having a rating

- A second region on the display screen where the preference settings are to be displayed

- The preference settings on the user interface can be changed

This particular type of display is especially convenient for correcting user profile information in light of recommendation errors.

Against the recitation of the first region, the Examiner cites col. 6, lines 3-56 of Lemmons. This section of Lemmons refers to Fig. 2. Fig. 2, as stated in col. 2, lines 42-44, is a flow chart for providing options for selecting various display criteria. In other words, this part of Lemmons relates to the part of the recommendation system that takes place **PRIOR** to any ratings being established. This flow chart and the accompanying text to do not teach or suggest displaying a _rating_ in a first region, as claimed by Applicants. In fact, _these portions_ of Lemmons even fail to teach or suggest a user interface comprising a display screen, much less what might be in regions of such a display screen, which renders the rejection especially

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defective. Moreover, Applicants are unable to find any display screens in Lemmons' figures that relate to display of a <u>rating</u> together with preferences settings from a <u>profile</u>.

Against the recitation of the second region, the Examiner cites col. 7, lines 23-53 of Lemmons. This section of Lemmons is still relating to events that prior to any rating being established. This section fails to teach or suggest that specification of preferences would occur on the same screen with a rating.

The Examiner admits that the preferences cannot be changed in Lemmons, if a rating is incorrect.

For this proposition, the Examiner cites Herz, col. 13, lines 53-67. This section of Herz appears to relate to getting feedback from users about incorrect ratings. It does not appear to relate to a user interface, including rating and preference setting information, as claimed by Applicants. Indeed Herz's following section, at col. 14, lines 34-48, teaches that the user should rate current programs without reference to the prior ratings. Thus the section at columns 13-14 teaches away from display of the prior preference settings along with current rating information. Moreover, the format of the display to the user, e.g. what is in what region of the display, is not indicated in these sections. These sections do not appear to relate to the display screen of a user interface at all. Thus Herz fails to correct all the deficiencies of Lemmons.

The references, at least as applied, are thus similarly defective with respect to the particular display aspects of the user interface as recited by Applicants in claim 1. Applicants therefore respectfully submit that the Examiner has not made a *prima facie* case of obviousness against claim 1.

Claim 19 is analogous to claim 1 in its relevant limitations.

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Claims 28 and 29 have been added to clarify that the preferences are to be changed by the user with respect to the second region of the display screen. This is not taught or suggested by the references.

Art rejections: independent claim 10

Claim 10 recites a method for correcting a previously defined preference profile to more accurately reflect a user's preferences. Claim 10 also recites, *inter alia*, enabling the user to change at least one of the preference settings, if the rating derived by the profile is incorrect.

Against this, and the other recitations, the Examiner points to Herz at col . 15, lines 45-65 and col. 17 lines 19 & 43-64. Applicants respectfully disagree with Examiner's characterization of these sections.

As far as Applicants can tell, the portion in Herz' col. 15 outlines ways of getting input from user populations relating to the correctness or incorrectness of ratings, which characterize broadcasts. It does not appear that any user profile is being changed here, but rather the ratings of programs. Moreover, Applicants understand this section to mean that any change made by the broadcaster is in response to a group of user inputs and on a statistical basis. This fails to teach or suggest a user changing a preference setting in a profile, as recited in Applicants' claim 10.

The portion of Herz that the Examiner indicates in column 17 seems to relate to initial setup of a profile. This section does not, so far as Applicant can tell, relate to altering a profile after display of a rating. Profiles are only to be changed in response to experts and test groups per Herz col. 17, lines 20-25.

Claim 10 further recites displaying of certain data identified in the claim. It is not at all clear — from the sections that the Examiner cites for this claim — what is actually displayed to

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the user in the reference. Accordingly, it is impossible to determine whether the claim is rendered obvious.

For these reasons, Applicants respectfully submit that the Examiner has failed to make a *prima facie* case of obviousness against claim 10.

Art rejections: dependent claims

The dependent claims recite additional patentable distinctions over the reference. Some examples are given below.

Claims 4 & 22 recite a third region of the display for displaying a rating from a second profile. Against this recitation, the Examiner cites column 9 of Lemmons. This section of Lemmons relates to allowing a user to specify display options, such as color, for programs to be recommended in the future by a program recommender, prior to any rating being established. Applicants are unable to find where this section teaches or suggests first, second, and third regions, as claimed by Applicants, where the first region displays a rating; the second region displays information relating to a first profile; and the third region displays information relating to a second profile. Accordingly, Applicants respectfully submit that the Examiner has failed to make a *prima facie* case of obviousness against claims 4 and 22

Claims 5, 14, and 23 recite that the first profile is explicit-based while the second profile is implicit-based. For this recitation, the Examiner points to col. 10, lines 9-67 of Lemmons. This section of Lemmons mentions maintaining multiple user profiles, one for each user. Applicants are unable to find in this column that some profiles are explicit-based and others implicit-based.   New claims 30-32 are added to clarify that the first and second profiles are

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intended to relate to the same user, which also does not appear to be taught or suggested by this section of Lemmons.

Claims 8, 17, and 26 recite that features can be added to the profile. Against this recitation, the Examiner cites col. 11, lines 11-67 of Lemmons. But, as far as Applicants can tell, this section only relates to what goes on before any rating is established, during initial setup. Applicants' claims, by contrast, relate to adding features to a profile <u>after a rating has been established</u>. Lemmons fails to teach or suggest this.

The Examiner's other rejections and/or points of argument not addressed would appear to be moot in view of the foregoing. Nevertheless, Applicants reserve the right to respond to those rejections and arguments and to advance additional arguments at a later date.

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REMARKS

Applicants respectfully submit that they have answered each issue raised by the Examiner and that the application is accordingly in condition for allowance. Allowance is therefore respectfully requested.

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Respectfully submitted,

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November 13, 2003

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